

IN THE UNITED STATES BANKRUPTCY COURT
FOR EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Phylllice J. Jackson fka Phylllice Freeman
fka Phylllice Anthony fka Phyllis Freeman
aka Phyllis Jackson fka Phyllis Anthony
Debtor

Fay Servicing, LLC as servicer for
Metropolitan Life Insurance Company

v.

Phylllice J. Jackson fka Phylllice Freeman
fka Phylllice Anthony fka Phyllis Freeman
aka Phyllis Jackson fka Phyllis Anthony
Kenneth E. West - Trustee
Respondents

CASE NO.: 20-11639-amc

CHAPTER 13

Judge: Ashely M. Chan

NOTICE OF APPEARANCE

PLEASE TAKE NOTICE that the undersigned hereby appears in the above-captioned Chapter 13 case on behalf of Fay Servicing, LLC as servicer for Metropolitan Life Insurance Company, and hereby requests that all notices given or required to be given in these cases, and all papers served or required to be served in these cases, be given to and served upon the following:

FRIEDMAN VARTOLO LLP
Attorneys for Fay Servicing, LLC as Servicer for
Metropolitan Life Insurance Company
1325 Franklin Avenue, Suite 160
Garden City, NY 11530
Bankruptcy@FriedmanVartolo.com

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes all pleadings of any kind including, without limitation, all notices, motions, complaints, and orders, whether written or oral, formal, or informal, however transmitted, related in any way to the debtor, its property or its estates. The persons listed above request that their names and addresses be added to the mailing matrix.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Demand for Service of Papers nor any later appearance, pleading, proof of claim, claim, or suit shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after de novo review by a District Judge, (ii) the right to trial by jury in any proceeding triable in this case or any case, controversy, or proceeding related to this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction or venue of this Court for any purpose other than with respect to this Notice, (v) an election of remedy, or (vi) any other right, claim, defense, setoff, or recoupment, in law or in equity, under any agreement, all of which are expressly waived.

Dated: August 28, 2024
Garden City, New York

By: /s/ Lauren Moyer
Lauren Moyer, Esq.
FRIEDMAN VARTOLO LLP
Attorneys for Movant
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CERTIFICATE OF SERVICE OF NOTICE OF APPEARANCE

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on August 28, 2024.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was first-class mail and electronic notification.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the full name, email address, and where applicable the full name of the person or entity represented, for each party served by electronic transmission is listed under the heading “Service by NEF,” and the full name and complete postal address for each party served by mail, is listed under the heading “Service by First-Class Mail.”

EXECUTED ON: August 28, 2024

By: /s/ Lauren Moyer
Lauren Moyer, Esq.
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Service by Regular Mail

Phylllice J. Jackson fka Phylllice Freeman fka Phylllice Anthony fka Phyllis Freeman aka
Phyllis Jackson fka Phyllis Anthony
1502 Walnut Ridge Estates
Pottstown, PA 19464

Bankruptcy Debtor

Service by NEF

Joseph Quinn, Esq.
Ross, Quinn & Ploppert, P.C.
192 S. Hanover Street, Suite 101
Pottstown, PA 19464

Debtor's Attorney

Kenneth E. West
Office of the Chapter 13 Standing Trustee
1234 Market Street - Suite 1813
Philadelphia, PA 19107

Bankruptcy Trustee

United States Trustee
Office of the U.S. Trustee
Robert N.C. Nix Federal Building
900 Market Street, Suite 320
Philadelphia, PA 19107

United States Trustee